

Exhibit 5

Appendix A - Initial Proposed Search Terms

The search terms below are proposed to identify and isolate for production documents responsive to the indicated Requests from the United States' Second Requests for Production. Use of search terms supplements and does not replace the requirement to produce any responsive documents of which defendants are aware or become aware, regardless of whether the search terms proposed below would return such a document.

Instructions:

1. As used in this proposal, “and” and “or” refer to the Boolean operators AND and OR. “Or” should return documents containing either term or both.
 2. As used in this proposal, “!” refers to a wildcard character that captures any suffix or ending that follows the identified portion of the word. For example, “assist!” captures assist, assists, assistance, and assistor.
 3. As used in this proposal, “w/” refers to a search limitation that returns results where the word or phrase preceding the limitation is within the stated number of words or the word or phrase following the limitation. For example, “Assist w/3 voter” returns results where the word “assist” appears within three words of the word “voter.” If a “w/” or equivalent operator is not functional on the system used to run these terms, an “and” operator should be substituted for the “w/” operator.
 4. As used in this proposal, quotation marks around a search term refers to a limitation that returns results only if the full phrase indicated appears within the document. For example, “reading the ballot” would return results for “confine my assistance to reading the ballot” but not “I have been reading about the candidates in order to prepare my ballot.”
 5. Terms should be run without regard to letter case. For example, the term “assist” should capture assist, Assist, assisT, ASsist, etc.
 6. Each bulleted proposal is designed to be run as a single search string. However, if a string cannot be run as written, a string or strings that can be run using the same search terms and functional limitations should be substituted.
 7. The United States requests to meet and confer before the search terms to be run are finalized. To the extent that these search terms are not acceptable to Defendants—or if Defendants are aware that these search terms will not return all reasonably available responsive documents from searched systems of records—the United States requests that the conference be held no later than December 10, 2021. The United States also requests that Defendants identify any additional requests that they believe will require use of search terms to identify documents for production at or before this conference.
- Requests 5, 6, 8, 16, 25-27
 - ((vot! or elec!) and (assist! or interpret! or translat!)) w/10 (oath or (cast! w/3 ballot) or (cast! w/3 vote) or (mark! w/3 ballot) or (read! w/3 ballot) or (understand! w/3 ballot) or (explain! w/3 ballot) or “SB 1” or “SB 7” or “HB 9”

- or “Senate Bill 1” or “Senate Bill 7” or “House Bill 6” or coerce! or influence! Or perjury)
 - (draft! or write) and ((“SB 1” or “Senate Bill 1” or “SB 7” “Senate Bill 7” or “HB 6” or “House Bill 6” or ((legislation or bill) w/2 (vote! or elect!))) and (assist! or interpret! or translate! or oath)
 - (vote! or elec!) and (fraud! or anti-fraud! or steal or cheat or security or integrity or (illegal! w/3 vote!)) and (assist! or interp! or trans! or oath)
- Requests 7, 9, 16, 25-27
 - (vote! or elec!) and (mail or absentee or ABBM) and ((driver! w/2 license) or “identification card” or (election w/2 certificate) or “social security number” or “SSN”)
 - ((absentee w/2 ballot) or (absentee w/2 vote!) or (mail w/2 ballot) or (mail w/2 vote!) or “ABBM”) w/10 (integrity or fraud! or safety or security or influence)
 - (“SB 1” or “Senate Bill 1” “SB 7” or “Senate Bill 7” or “HB 6” or “House Bill 6” or ((legislation or bill) w/2 (vote! or elect!))) and ((driver! w/2 license) or “identification card” or “Election Administration Management” or “TEAM” or “TEAMS” or (election w/2 certificate))
 - (“SB 1” or “Senate Bill 1” “SB 7” or “Senate Bill 7” or “HB 6” or “House Bill 6” or ((legislation or bill) w/2 (vote! or elect!))) and (absentee w/2 ballot) or (absentee w/2 vote!) or (mail w/2 ballot) or (mail w/2 vote!) or “ABBM”)
 - (vote! or elec!) and (fraud! or anti-fraud! or steal or cheat or security or integrity or (illegal! w/3 vote!)) and ((absentee w/2 ballot) or (absentee w/2 vote!) or (mail w/2 ballot) or (mail w/2 vote!) or “ABBM”)
- Request 10
 - (“SB 1” or “Senate Bill 1” or “SB 7” or “Senate Bill 7” or “HB 6” or “House Bill 6” or ((legislation or bill) w/2 (vote! or elect!)) or (elec! w/2 study) or (vote! w/2 study)) and (interpret! or assist!) and (Calc! or report! or audit! or estimate! or project! or analy! or predict!)
- Request 11
 - (“SB 1” or “Senate Bill 1” or “SB 7” or “Senate Bill 7” or “HB 6” or “House Bill 6” or ((legislation or bill) w/2 (vote! or elect!)) or (elec! w/2 study) or (vote! w/2 study)) and ((absentee w/2 ballot) or (absentee w/2 vote!) or (mail w/2 ballot) or (mail w/2 vote!) or “ABBM”) and (Calc! or report! or audit! or estimate! or project! or analy! or predict!)
 - (“vote by mail” or (mail w/2 ballot) or (absent! w/2 ballot) or ABBM) and (Calc! or report! or audit! or estimate! or project! or analy! or predict!) and (“identification card” or (driver w/2 license) or (election w/2 certificate) or turnout or regist!)

- Request 12
 - (vot! or elec!) and (mail or absentee or ABBM) and (calc! or report! or estimate! or project! or analy! or audit! or predict!) and (turnout or regist! or (appl! w/5 ballot) or (appl! w/5 (vote w/4 (mail or ABBM))) or (request! w/5 ballot) or (request! w/5 (vote w/4 (mail or ABBM))) or ((reject! or accept!) w/5 (ballot or (vote w/4 (mail or ABBM))))
 - (vot! or elec!) and (assist! or interp!) and (calc! or report! or estimate! or project! or analy! or audit! or predict!) and (turnout or regist! or ((receiv! or request! or obtain! or get!) w/5 (assist! or interp!)))
- Request 15
 - (vot! or elect!) and (mail or absentee or ABBM) and (“Election Administration Management” or “TEAM” or “TEAMS” or ((DPS or “public safety”) w/5 database) or (driver! w/2 license) or “identification card” or (elect! w/3 certificate)) w/10 (accur! or inaccur! or error or compl! or incompl! or match or mismatch or “no match” or discrep! or duplic! or “missing record” or “missing records” or “missing entry” or “missing info” or “missing information” or “missing field”)
- Request 24
 - (fraud! or integrity or error or secur! or admin! or improve! or fix! or analy!) w/10 ((election w/4 2020) or (trump w/4 election) or (biden w/4 election) or (pres! w/2 election))